

Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000
FACSIMILE: +1-212-455-2502

Direct Dial Number
+1-212-455-3070

E-mail Address
Brooke.Cucinella@stblaw.com

MEMO ENDORSED

BY ECF

August 6, 2020

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

Dear Judge Pauley:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request, with the consent of Pre-Trial Services and the Government's deferral to Pre-Trial, a modification of Ms. Daniels's conditions of release and personal address, which Ms. Daniels is seeking to change as soon as this coming Monday, August 10. On November 25, 2019, Ms. Daniels was ordered released on a \$50,000 Appearance Bond to be secured by two financially responsible persons. Among other conditions of her release, Ms. Daniels was subject to a restriction limiting her travel to the Southern and Eastern Districts of New York and the District of New Jersey.

Given the pandemic and the challenges Ms. Daniels faced as a single mother in the New Jersey area, she sought to move to Virginia to live with her aunt, which Your Honor approved on July 2, 2020. *See* Dkt. No. 36. Ms. Daniels thought she would have a stable support system in place for herself and her children by moving to Virginia; however, when Ms. Daniels arrived in Virginia, she found the situation to be unexpectedly untenable and she now does not feel it is a safe environment for her children, either presently or as a long-term solution. Ms. Daniels's mother, LaToya Daniels, currently lives in a three-bedroom home in Harrisburg, Pennsylvania. She is employed in retail (America Turkey Hill), and believes she can use her connections to assist Ms. Daniels in securing a temporary job, either at the location where she works or another retail location close by. Ms. Daniels believes moving to Harrisburg to live with her mother will be better temporarily and in the long-run for her children, as we are currently discussing potential resolutions of Ms. Daniels's case with the Government.

August 6, 2020

The Honorable William H. Pauley III

Accordingly, we respectfully request that Ms. Daniels be allowed to move to and be supervised out of Pennsylvania, where she will stay with her mother. Additionally, we ask that Ms. Daniels's conditions of release be altered to allow her to travel to and from Pennsylvania and the Southern District of New York as necessary for her case (Ms. Daniels owns a car). The opportunity to live with her mother presents an opportunity for Ms. Daniels to provide a safe environment for her children both immediately and in the future. Ms. Daniels has fully complied with her conditions of release to date and intends to continue doing so: she is fully committed to appearing in Court for all future court appearances, and living with her mother will allow her children to be cared for while she appears in Court.

We have conferred with Ms. Daniels's Pretrial Officer in Virginia, as well as pretrial in New York, and Assistant U.S. Attorney Rebecca Dell, who have advised that they understand the reasons for the quick relocation (should the Court grant her request, Ms. Daniels would like to relocate as soon as next week). AUSA Dell has advised that she defers to pretrial, who consents to Ms. Daniels's request to move to Pennsylvania and to modify her conditions of release. We will request that Officer Lisa Chan, from SDNY, reach out to Pretrial Services in the Middle District of Pennsylvania to supervise Ms. Daniels should her request to move be granted.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella
Brooke Cucinella

cc: AUSA Rebecca Dell

Application granted.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

August 6, 2020